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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his
guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado; C.S., a minor by
and through his guardian ad litem Elsa
Acosta, individually and as successor-
in-interest to William Salgado; J.S., a
minor by and through her guardian ad
litem Elsa Acosta, individually and as
successor-in-interest to William
Salgado; M.S., a minor by and through
her guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado,

**Case No. 2:23-cv-09412-CBM-AGR
(Consolidated with Case No. 2:24-cv-
04898-CBM-AGR)**

*District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg*

**STIPULATION AND JOINT
REQUEST FOR ORDER
CONTINUING INITIAL PRETRIAL
FILING DEADLINES BY ONE
WEEK ONLY**

*[Proposed Order filed concurrently
herewith]*

1 Plaintiffs,

2 v.

3 CITY OF HUNTINGTON PARK;
4 NICK NICHOLS; RENE REZA;
5 MATTHEW RINCON; APRIL
6 WHEELER; and DOES 5 through 10,
7 inclusive,

8 Defendants.

9 WILLIAM OMAR CASTILLO
10 MIRANDA, an individual and as
11 Successor in Interest for Decedent,
12 WILLIAM RENE SALGADO
13 MIRANDA; JUANA MARIA
14 MIRANDA, an individual and as
15 Successor in Interest for Decedent,
16 WILLIAM RENE SALGADO
17 MIRANDA; OSMAR ANTONIO
18 CASTILLO BLANDON, a minor by
19 and through Guardian ad litem,
20 EUGENIA GUADELUPE ESPINOZA
21 SALMERON; EUGENIA
22 GUADELUPE ESPINOZA
23 SALMERON, an individual; KARLA
24 VANESSA BLANDON, an individual,

25 Plaintiffs,

26 v.

27 CITY OF HUNTINGTON PARK;
28 RENE REZA, an individual; APRIL
 WHEELER, an individual; MATTHEW
 RINCON, an individual; NICK
 NICHOLS, an individual; JOSE A.
 YAMASAKI, an individual; SAUL
 RODRIGUEZ, an individual; and
 DOES 1 TO 10, inclusive,

 Defendants.

1 **TO THE HONORABLE COURT:**

2 IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs D.S., C.S.,
3 J.S., and M.S. (“*Salgado* Plaintiffs”); Plaintiffs William Omar Castillo Miranda,
4 Juana Maria Miranda, Osmar Antonio Castillo Blandon, Eugenia Guadalupe
5 Espinoza Salmeron, and Karla Vanessa Blandon (“*Miranda* Plaintiffs”); and
6 Defendants City of Huntington Park, Rene Reza, April Wheeler, Matthew Rincon,
7 Nick Nichols, Jose A. Yamasaki, and Saul Rodriguez (“Defendants”)—the parties to
8 this action—for the purpose of jointly requesting that the honorable Court enter an
9 order, pursuant to Fed. R. Civ. P. 16(b)(4) and any applicable Orders of the Court,
10 continuing the deadline for the filing of initial pretrial documents in this case by one
11 week, as follows:

12 **GOOD CAUSE STATEMENT.**

- 13 1. WHEREAS, this is a wrongful death civil rights case involving the City of
14 Huntington Park Police Department. The *Salgado* Plaintiffs’ original
15 Complaint was filed against the City of Huntington Park and Doe defendants
16 on November 7, 2023. [Dkt. 1.] After that Complaint was filed, a First
17 Amended Complaint was filed on July 10, 2024, naming additional
18 defendants. [Dkt. 31-1.] All named defendants subsequently answered the
19 First Amended Complaint.
- 20 2. The Court issued an Order setting pretrial and trial dates and deadlines in the
21 *Salgado* action on April 30, 2024. [Dkt. 22.] Those dates and deadlines
22 included a Pre Trial Conference set for April 22, 2025, at 2:30 p.m. [*Id.*]
- 23 3. The *Miranda* Plaintiffs’ original Complaint was filed on June 11, 2024. [No.
24 2:24-cv-04898-CBM-AGR, Dkt. 1.] After that Complaint was filed, a First
25 Amended Complaint was filed on July 29, 2024, naming additional
26 defendants. [No. 2:24-cv-04898-CBM-AGR, Dkt. 12.] All named defendants
27 subsequently answered the First Amended Complaint.
- 28

- 1 4. The Court issued an Order consolidating the *Salgado* and *Miranda* cases for
2 purposes of discovery and trial on September 3, 2024, under the *Salgado*
3 docket, No. 2:23-cv-09412-CBM-AGR. [Dkt. 38.]
- 4 5. This Court's Local Rules set forth various requirements for the filing of
5 pretrial documents. These include requirements that parties file, "[n]ot later
6 than twenty-one (21) days before the Final Pretrial Conference," a
7 Memorandum of Contentions of Fact and law, a Witness List, and a Joint
8 Exhibit List. (L.R. 16-4, 16-5, 16-6.1.) As such, these documents are currently
9 due to the Court by April 1, 2025. [*See id.*, Dkt. 22.]
- 10 6. The parties to this action are currently set to participate in a mediation with
11 panel mediator Richard Copeland on April 3, 2025.
- 12 7. Additionally, a motion for summary judgment filed in the *Miranda* action is
13 currently set for a hearing before the Court on April 1, 2025, at 10:00 a.m.
14 [No. 2:24-cv-04898-CBM-AGR, Dkt. 25.]
- 15 8. In order to allow the parties to participate in the scheduled mediation and
16 endeavor to resolve this action prior to trial, without the parties first having to
17 prepare and submit the above-mentioned pretrial documents to the Court, the
18 parties are respectfully requesting that the Court continue the deadlines
19 governing the submission of these documents by seven (7) days only, such
20 that the Memoranda of Contentions of Fact and Law, Witness Lists, and Joint
21 Exhibit List would be due on April 8, 2025.
- 22 9. This is the first request by the parties for a continuance of the above deadlines
23 in this matter, and the fourth request for a continuance more generally.

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STIPULATION RE CONTINUANCE OF SCHEDULING ORDER

DEADLINE.

10. Accordingly, in light of the foregoing Good Cause, the parties hereby stipulate and request an order continuing the deadline for the filing of the above-mentioned pretrial documents as follows:

EVENT	CURRENT DEADLINE	REQUESTED DEADLINE
Deadline to File Memorandum of Contentions of Fact and Law (L.R. 16-4)	04/01/2025	04/08/2025
Deadline to File Witness List (L.R. 16-5)	04/01/2025	04/08/2025
Deadline to File Joint Exhibit List (L.R. 16-6.1)	04/01/2025	04/08/2025

11. The parties are not currently requesting a continuance of any other dates or deadlines set by the Court in this case and the parties understand that all other dates and deadlines shall remain unchanged and unaffected by the parties' stipulation and by the Order requested by the parties.

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1 **IT IS SO STIPULATED.**

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3 DATED: March 28, 2025

LAW OFFICES OF DALE K. GALIPO

4
5 By: /s/ Benjamin S. Levine

Dale K. Galipo

6 Benjamin S. Levine¹

7 *Attorneys for Plaintiffs D.S., C.S.,*
8 *J.S., and M.S.*

9 DATED: March 28, 2025

CARRAZCO LAW, A.P.C.

10
11 By: /s/ Kent M. Henderson

12 Angel Carrazco, Jr.

Kent M. Henderson

13 Christopher L. Holm

14 *Attorneys for Plaintiffs William Omar*

Castillo Miranda, Juana Maria

15 *Miranda, Osmar Antonio Castillo*

16 *Blandon, Eugenia Guadalupe Espinoza*

17 *Salmeron, and Karla Vanessa Blandon*

18 DATED: March 28, 2025

ALVAREZ-GLASMAN & COLVIN

19
20 By: /s/ Roger A. Colvin

21 Roger A. Colvin

22 Christy M. Garcia

23 *Attorneys for Defendants*

24
25
26
27 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all
28 other signatories listed, and on whose behalf the filing is submitted, concur in the
filing's content and have authorized the filing.